

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOHN MANGANO and MICHAEL
LEIFMAN, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

BLOCKFI, BLOCKFI, INC., BLOCKFI
TRADING, LLC, BLOCKFI LENDING,
LLC,

Defendants.

Case No. 2:22-cv-01112

Hon. Kevin McNulty, U.S.D.J.

Hon. Cathy L. Waldor, U.S.M.J.

**NOTICE OF SUGGESTION OF BANKRUPTCY
FOR BLOCKFI INC. AND ITS DEBTOR AFFILIATES
AND AUTOMATIC STAY OF PROCEEDINGS**

PLEASE TAKE NOTICE that on November 28, 2022, Defendant BlockFi Inc., and eight of its affiliates, including Defendants BlockFi Trading LLC and BlockFi Lending LLC, filed voluntary petitions under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”). A copy of the voluntary petition of the lead Debtor, BlockFi Inc., is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that the Debtors’ chapter 11 cases are pending before the Honorable Judge Michael Kaplan and are being jointly administered under the lead case *In re BlockFi Inc.*, Case No. 22-19361 (MBK) (the “Chapter 11 Cases”). A copy of the order entered on November 29, 2022 directing joint administration of these Chapter 11 Cases is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that, pursuant to section 362(a) of the Bankruptcy Code, the Debtors’ filing of their respective voluntary petitions gives rise to a stay,

applicable to all entities, of, among other things: (a) the commencement or continuation of any judicial, administrative, or other action or proceeding against the Debtors (i) that was or could have been commenced before the commencement of the Chapter 11 Cases, or (ii) to recover a claim against the Debtors that arose before the commencement of the Chapter 11 Cases; (b) the enforcement against any of the Debtors or against any property of each of the Debtors' bankruptcy estates of a judgment obtained prior to the commencement of the Chapter 11 Cases; and (c) any act to obtain possession of property of or from any of the Debtors' bankruptcy estates, or to exercise control over property of any of the Debtors' bankruptcy estates.¹ No order has been entered in the Chapter 11 Cases granting relief from the automatic stay. Attached as **Exhibit C** is the November 30, 2022 Order (I) Restating and Enforcing the Worldwide Automatic Stay, Anti-Discrimination Provisions, and *Ipsa Facto* Protections of the Bankruptcy Code and (II) Granting Related Relief.

PLEASE TAKE FURTHER NOTICE that additional information regarding the Chapter 11 Cases may be obtained by: (a) reviewing, free of charge, the docket of the Debtors' Chapter 11 Cases on the website of the Debtors' proposed claims and noticing agent, Kroll Restructuring Administration LLC ("Kroll"), at <https://restructuring.ra.kroll.com/blockfi> or by calling (888) 773-0375 (Toll-free from US / Canada) or +1 (646) 440-4371 (International); (b) visiting the Bankruptcy Court's website at <https://ecf.njb.uscourts.gov> (PACER login and password required) in accordance with the procedures and fees set forth therein; or (c) contacting any of the following proposed co-counsel to the Debtors: (i) Kirkland & Ellis LLP, 601 Lexington

¹ Nothing herein shall constitute a waiver of the Debtors' rights to assert any claims, counterclaims, defenses, rights of setoff or recoupment, or any other claims against any party to the above-captioned case. The Debtors expressly reserve all rights to contest any claims that may be asserted against the Debtors.

Avenue, New York, New York 10022, Attn.: Joshua Sussberg, P.C., Christine Okike, P.C., and Francis Petrie; (ii) Haynes and Boone LLP, 30 Rockefeller Plaza, 26th Floor, New York, New York 10112, Attn: Richard Kanowitz and Kenric Kattner; (iii) Cole Schotz, P.C., Court Plaza North, 25 Main Street, Hackensack, New Jersey 07601, Attn: Michael Sirota and Warren Usatin.

Dated: December 2, 2022

Respectfully submitted,

GERMANO LAW LLC

By: /s/ Judith H. Germano

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Attorneys for Defendants BlockFi, Inc., BlockFi Lending LLC, BlockFi Trading LLC

CERTIFICATE OF SERVICE

I, Judith H. Germano, certify that on the 2nd day of December, 2022, I caused to be served a true and correct copy of the foregoing document and related exhibits on all parties of record via ECF.

Dated: December 2, 2022

/s/Judith H. Germano

Judith H. Germano (Bar #017172010)

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